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13 *Attorneys for Defendant Frank Christian Sidoris and*  
14 *Defendant/Counterclaimant/Third-Party Plaintiff*  
15 *Alexandria Gomez*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

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19 AMGUARD INSURANCE COMPANY,

20 Plaintiff,

21 vs.

22 FRANK CHRISTIAN SIDORIS, an individual;  
23 ALEXANDRIA GOMEZ, an individual;  
24 VICTOR MANUEL AGUILERA, an individual;  
25 PRIMO'S AUTO REPAIR LLC, a Nevada  
limited liability company; DOES 1 through 10;  
and ROES 10 through 20, inclusive,

26 Defendants.

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28 ALEXANDRIA GOMEZ, an individual,

29 Counterclaimant,

30 vs.

31 AMGUARD INSURANCE COMPANY, a  
32 foreign corporation,  
33 Counter-defendant.

34 Case No.: 2:23-cv-00965-RFB-DJA

35 **STIPULATION AND REQUEST FOR**  
36 **ORDER EXTENDING TIME FOR**  
37 **GOMEZ TO REPLY IN SUPPORT OF**  
38 **COUNTERCLAIMANT'S MOTION TO**  
39 **DISMISS AMGUARD INSURANCE**  
40 **COMPANY'S COMPLAINT FOR LACK**  
41 **OF SUBJECT MATTER JURISDICTION**  
42 **(FIRST REQUEST)**

1 ALEXANDRIA GOMEZ, an individual,

2 Third-Party Plaintiff,

3 vs.

4 GEICO CASUALTY COMPANY, a foreign  
5 corporation; NEVADA INSURANCE  
6 SOLUTIONS, INC., a Nevada corporation,  
7 FRANK GUZMAN, an individual, DOES I  
through X; and ROE CORPORATIONS I  
through X, Inclusive,

8 Third-Party Defendants.

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10 Plaintiff/Counter-defendant AmGUARD Insurance Company (“AmGUARD”), third-party  
11 defendant GEICO, and Counterclaimant/Defendant/Third-Party Plaintiff Alexandria Gomez  
12 (“Gomez”) by and through their respective attorneys of record, stipulate and agree to extend the  
13 deadline for Gomez to file a reply to AmGUARD’s opposition to Gomez’s motion to dismiss [ECF  
14 No. 47], filed on December 7, 2023 and GEICO’s joinder thereto [ECF No. 48], filed on December  
15 12, 2023. This is Gomez’s first request to extend the deadline to reply to AmGUARD’s opposition.

16 The current deadline for Gomez to submit its reply is December 14, 2023. Gomez has  
17 requested, and AmGUARD and GEICO have agreed to, extend the deadline to Thursday, December  
18 21, 2023, so that Gomez has adequate time to analyze and prepare a responsive pleading.

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1 Accordingly, AmGUARD, GEICO, and Gomez hereby stipulate to extend the deadline for  
2 Gomez to reply to AmGUARD's opposition and GEICO's joinder to Thursday, December 21, 2023.  
3 DATED this 14th day of December, 2023.

4 **MAIER GUTIERREZ & ASSOCIATES**

5 /s/ Joseph A. Gutierrez

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Sidoris and  
Defendant/Counterclaimant/Third-Party  
Plaintiff Alexandria Gomez*

DATED this 14th day of December, 2023.

**ROPER MAJESKI PC**

/s/ Timothy J. Lepore

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*Attorneys for Plaintiff and Counter-defendant  
AmGUARD Insurance Company*

DATED this 14th day of December, 2023.

**McCORMICK, BARSTOW, SHEPPARD**

/s/ Jonathan W. Carlson

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*Attorneys for Third-Party Defendant Geico  
Advantage Insurance Company, erroneously  
sued and served herein as Geico Casualty  
Company*

IT IS SO ORDERED this 20th day of December, 2023.



RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE